

**From:** [Cora, Lori](#)  
**To:** ["Vrooman Gary L"](#)  
**Subject:** RE: Discussion on a couple ARARs requested  
**Date:** Monday, July 06, 2015 8:15:41 AM

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Thanks, Gary. How about 2:30 p.m. today? I can call you. I would appreciate it if you could get a water attorney to look at my second question and either email me the answer or call me to discuss. As usual I need this advice yesterday 😊 Thanks.

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**Lori Houck Cora** | Assistant Regional Counsel  
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**From:** Vrooman Gary L [<mailto:Gary.L.Vrooman@doj.state.or.us>]  
**Sent:** Thursday, July 02, 2015 4:47 PM  
**To:** Cora, Lori  
**Subject:** RE: Discussion on a couple ARARs requested

Hi Lori,

On the first question, yes I let's talk. How about some time between 2 and 4 on Monday?

I can talk about the second issue but I don't think I'd be much help. I can forward your second question on to DEQ's water attorney if you would like.

**Gary Vrooman**  
971.673.1878

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**From:** Cora, Lori [<mailto:Cora.Lori@epa.gov>]  
**Sent:** Thursday, July 02, 2015 4:21 PM  
**To:** Vrooman Gary L  
**Subject:** Discussion on a couple ARARs requested

Hi, Gary. Hope all is well. Sorry for all of the inquiries lately, you've been very accommodating with your quick responses. I would like to set up a call for next week if possible to discuss a few implementation specifics on a couple state regulations for the Portland Harbor cleanup.

First, have you heard back from DEQ staff as to state hazardous or solid waste regulations that may be applicable to the storage, handling, and possible treatment of dredged materials or debris at an on-site transloading facility where eventually all materials would be taken for off-site disposal? In this scenario, I believe EPA sees that the 404 exemption would end at the point that dredged material was slated for off-site disposal but needed stored and maybe was treated on-site.

I would like to talk through with you how DEQ typically writes up 401 certifications for dredge

projects and specifically how under the Oregon water quality law, you characterize the area around the dredge bucket that can exceed WQS or put another way, how under State law do you establish the point of compliance? I don't think you use your mixing zone authority, correct? What in your regs provides for establishing point of compliance for short-term dredging projects?

We are drafting the sections of the FS that describe how each alternative will comply with ARARs and we need some guidance from you on how dredging and the concurrent turbidity and other discharges get approved.

I'm in all next week. Could you let me know when we may be able to chat? Thanks. Have a great long weekend.

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